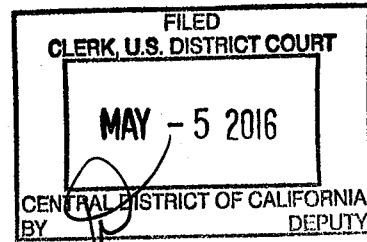


LIST OF EXHIBITS AND WITNESSES

Case Number	CV 14-3242-PSG (PJWx):	Title	COLONY COVE PROPERTIES, LLC. -VS- CITY OF CARSON, ET AL.					
Judge	PHILIP S. GUTIERREZ							
Dates of Trial or Hearing	4/28/16; 4/29/16; 5/3/16; 5/4/16, 5/5/16							
Court Reporters or Tape No.	MAREA WOOLRICH; MIRANDA ALGORRI							
Deputy Clerks	WENDY HERNANDEZ							
Attorney(s) for Plaintiff(s) / Petitioner(s)					Attorney(s) for Defendant(s) / Respondent(s)			
Matthew Close					Stephen Onstot			
Dimitri Portnoi					June Ailin			
Thomas Casparian					Jeffrey Malawy			
Plaintiff(s) or Petitioner(s)			Defendant(s) or Respondent(s)			EXHIBIT DESCRIPTION / WITNESS		Called By
Ex. No.	Id.	Ev.	Ex. No.	Id.	Ev.			
D1	4/28/16	5/3/16				CARSON HARBOUR & COLONY COVE		
D2	4/28/16	5/3/16				COMPARISON OF RENTS at Carson Harbor CC		
D3	4/28/16	5/3/16				Timeline		
D4	4/29/16	5/3/16				Lost Rent Damage Calculation		
D5	4/29/16	5/3/16				Colony Cove Lost Rent Damages		
D6	4/29/16	5/3/16				Calculation of Prejudgment Interest		
D7	4/29/16	5/3/16				Historical Levels of the S&P 500 Index		
D8	4/28/16	5/3/16				Listing Price and Offers for Colony Cove		
D9	4/28/16	5/3/16				Damage Calculations Before Interest		
D10	4/28/16	5/3/16				Damage Calculations With Interest		
			D13		5/3	GUIDELINES EXCERPT		
			D14		5/3	ORDINANCE EXCERPT		
			D15		5/3	LETTER EXCERPT 1		
			D16		5/3	LETTER EXCERPT 2		
			D17		5/3	LETTER EXCERPT 3		
			D18		5/3	POTENTIAL RENT INCREASES		
			D19		5/3	SALOMON/ELLIS COMPARISON		

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*Additional Plaintiff's counsel listed on
signature page.*

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Attorneys for Defendants
City of Carson and City of Carson
Mobilehome Park Rental Review Board

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

COLONY COVE PROPERTIES, LLC, a
Delaware limited liability company,

Plaintiff,

v.

CITY OF CARSON, a municipal
corporation; CITY OF CARSON
MOBILEHOME PARK RENTAL
REVIEW BOARD, a public administrative
body; and DOES 1 to 10, inclusive,

Defendants.

Case No. CV 14-03242 PSG (PJWx)

JOINT WITNESS LIST

Judge: Hon. Philip S. Gutierrez
Pretrial Conference: March 21, 2016
Trial Date: April 5, 2016

Pursuant to Local Rule 16-5, Plaintiff Colony Cove Properties, LLC ("Colony Cove") and Defendants City of Carson and City of Carson Mobilehome Park Rental Review Board (collectively, the "City" or "Defendants") hereby submit the following joint witness list:

Colony Cove Properties, LLC v. City of Carson, et al.
Case No. CV 14-03242 PSG (PJWx)

Name	Party Calling	Brief Description of Testimony	Length of Direct Examination	Length of Cross Examination	Total Time
James F. Goldstein	Plaintiff	Colony Cove's negotiation and purchase of Colony Cove Mobile Estates (the "Park") and Colony Cove's reasonable, investment-backed expectations at the time of the purchase regarding the City's treatment of Colony Cove's debt service. The losses the Park suffered in the relevant years.	4 hours 4/22/14 5/3/14	2 hours	6 hours
Noelle Stephens	Plaintiff	Colony Cove's expenses, income, and operating losses in the relevant years.	90 minutes 4/29/14	1 hour	2 hours 30 minutes

1	Peter A. Salomon	Plaintiff	Expert opinion on the amount of economic damages owed to Colony Cove due to the City's actions related to not providing rent increases that account for the financing costs Colony Cove incurred to purchase the Park in April 2006. Expert opinion on prejudgment interest rate and the amount of prejudgment interest on these economic damages.	3 hours 4/29/14	1 hour	4 hours
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15	Rob A. Detling	Plaintiff	Expert opinion on the appraised value of the Park at the time of Colony Cove's purchase in April 2006.	2 hours 4/29/14	1 hour	3 hours
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1	Kenneth Baar	Defendants	Expert analysis of factors and methods Defendants may use to set allowable rent increases and the economic foundation for them; precedent with respect to consideration of debt service. Unique in that he is the only witness that will assist the trier of fact in understanding the variables that may be analyzed and approaches taken by Defendants in making rent control decisions.	2 hours 5/3/16	2 hours	4 hours
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15	James Brabant	Defendants	Expert opinion (1) critiquing John Neet's "Fair Return Analysis" and Rob Detling's appraisal of the park, and (2) presenting his own appraisal of the value of the park at the time of purchase by Plaintiff. Unique in that he is the only witness providing such critiques and an appraisal other than Plaintiff's.	2 hours	2 hours	4 hours
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25	John Ellis	Defendants	Expert opinion critiquing Salomon's report on damages. Unique in that he is the only witness providing such critique.	1 hour 5/3/16	1 hour	2 hours
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1	Kenneth	Defendants	Nature of the	4 hours	2.5 hours	6.5
2	Freschauf		government action			hours
3			for Defendants' rent			
4			control system; how			
5			staff processes			
6			applications,			
7			particularly review			
8			of claimed			
9			expenses; staff			
10			processing of			
11			Colony Cove			
12			applications in			
13			Years 1-8; historical			
14			Board treatment of			
15			debt service			
16			expenses; revenue			
17			and expenses of			
18			Colony Cove;			
19			history of rent			
20			control litigation by			
21			Mr. Goldstein			
22			against Carson; Mr.			
23			Goldstein's			
24			applications to			
25			subdivide his			
26			Carson parks. Mr.			
27			Freschauf is unique			
28			in that he is			
			Defendants' staff on			
			rent control matters			
			and has been for			
			decades; thus, he is			
			the only witness			
			who will testify as			
			to how the rent			
			control system was			
			applied to Mr.			
			Goldstein's parks.			

1	Doug Danny	Defendants (via depo)	Market conditions for mobilehome park sales; negotiations for the sale and purchase of the park reflecting buyer's and sellers goals and expectations. Unique in that he is the real estate broker for the purchase and sale of the park.	45 minutes	20 minutes	1 hour 5 minutes
2				MAY - 3 2016		
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10	Mark Hansen	Defendants	Mr. Goldstein's objectives and expectations in purchasing the park using financing. Unique in that he was Mr. Goldstein's broker re financing.	2 hours 5/3/16	2 hours	4 hours
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15	Ann James*	Defendants (via depo)	Adverse witness regarding property management, including revenues and expenses. Unique in that she is the park's property manager	30 minutes	15 minutes	45 minutes
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20	Noelle Stephens*	Defendants	Adverse witness regarding park operations and profit/loss. Unique in that she was the "go to" person regarding park finances.	1 hour	Colony Cove objects to the City recalling this witness. The City should examine this witness on cross- examination.	
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James Goldstein*	Defendants	Adverse witness on economic impact and investment expectations. Unique in that Mr. Goldstein is the park owner.	3 hours	Colony Cove objects to the City recalling this witness. The City should examine this witness on cross-examination.	
John Neet*	Defendants	Adverse witness on the "Fair Return Analysis" he prepared in support of a rent increase application. Unique in that he was the author of such analysis.	30 minutes	15 minutes	45 minutes
Matt Crow*	Defendants (via depo)	How the park was marketed, Mr. Goldstein's investment expectations, and why Mr. Goldstein's offer for the park was accepted; authentication of documents by seller Grossman Properties. Unique in that he is the only witness representing the seller of the park.	15 minutes	15 minutes	30 minutes
Carson City Clerk/ Custodian of Records*	Defendants	Authentication/certification of city documents	15 minutes	15 minutes	30 minutes

* Asterisk indicates witness which a party may call if the need arises.

1 DATED: February 29, 2016

Respectfully submitted,

2 GILCHRIST & RUTTER
3 Professional Corporation

4 &

5 O'MELVENY & MYERS LLP

6
7 By: /s/ Matthew W. Close

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20
21 Attorneys for Plaintiff
22 Colony Cove Properties, LLC
23
24
25
26
27
28

1 DATED: February 29, 2016

ALESHIRE & WYNDER, LLP

2
3 By: /s/ Stephen R. Onstot

4 Sunny K. Soltani

5 June S. Ailin

6 Stephen R. Onstot

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11 Attorneys for Defendants City of Carson
12 and City of Carson Mobilehome Park
13 Rental Review Board, a public
14 administrative body

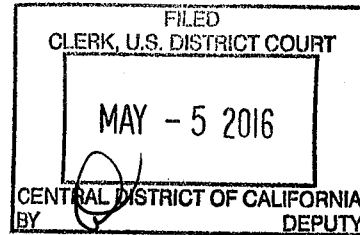
15
16 **ATTESTATION**

17 I hereby attest that the other signatory listed, on whose behalf this filing is
18 submitted, concurs in the filing's content and has authorized the filing.

19
20 Dated: February 29, 2016

O'MELVENY & MYERS LLP

21 By: /s/ Matthew W. Close
22 Matthew W. Close



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7 *Additional Plaintiff's counsel listed on*
signature page.

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9 Colony Cove Properties, LLC

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17 Attorneys for Defendants
18 City of Carson and City of Carson
Mobilehome Park Rental Review Board

20 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

21 COLONY COVE PROPERTIES, LLC, a
22 Delaware limited liability company,

23 Plaintiff,

24 v.

25 CITY OF CARSON, a municipal
corporation; CITY OF CARSON
26 MOBILEHOME PARK RENTAL
REVIEW BOARD, a public administrative
27 body; and DOES 1 to 10, inclusive,

28 Defendants.

Case No. CV 14-03242 PSG (PJWx)

REVISED JOINT EXHIBIT LIST

Judge: Hon. Philip S. Gutierrez
Trial Date: April 28, 2016

Pursuant to Local Rule 16-6.1, the Minutes of the March 21, 2016 Pretrial Conference (Dkt. No. 110), and the April 18, 2016 Pretrial Conference (Dkt. No. 143), Plaintiff Colony Cove Properties, LLC ("Plaintiff" or "Colony Cove") and Defendants City of Carson and City of Carson Mobilehome Park Rental Review Board (collectively, the "City" or "Defendants") hereby submit the following Revised Joint Exhibit List.

Colony Cove Properties, LLC v. City of Carson, et al.
Case No. CV 14-03242 PSG (PJWx)

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
8	General Electric Capital Corporation Letter to Jim Goldstein, dated February 17, 2006	Pltf	s	s			4/28
9	Hansen Financial Group Letter to James F. Goldstein, dated March 3, 2006	Pltf	s	s			4/28
10	Art Tuverson Email to Mark Hansen, dated March 7, 2006	Pltf	s	s			4/28

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
11	Loan Disbursement Statement	Pltf	S	S			4/28
18	Handwritten cover letter from James Goldstein to Matt Crowe re: 5% capitalization rate, financing of the park, and Richard Close's comments about the difficulties and risks for park owners in the City CC005330-CC005345	Def's	S	S		4/28/14	4/28
*21	Colony Cove Projected 2006 Income and Expenses CC005401	Def's	S	S			4/28
23	Handwritten notes re: effect of property tax increase, capital improvement, and new space income on rent increase CC005347	Def's	S	S			4/28

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
25	Supplement to Purchase Offer and Sales Contract, entered into as of March 29, 2006	Pltf	S	S			4/28/16
*26	First Amendment to Purchase Offer and Sales Contract dated March 7, 2006 CC000394-CC000395	Def's	S	S			4/28/16
28	Loan Agreement between Colony Cove Properties, LLC as Borrow and General Electric Capital Corporation as Lender, dated March 30, 2006	Pltf	S	S			4/28/16
29	Promissory Note for \$18,000,000.00, dated March 30, 2006	Pltf	S	S			4/28/16

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
30	Deed of Trust, Security Agreement and Fixture Filing, executed as of March 30, 2006	Pltf	s	s			4/28/10
35	Gilchrist & Rutter Letter to Kenneth Freschauf, dated March 27, 2008	Pltf	s	s			4/28/10
36	Self-Contained Appraisal Report of Rob A. Detling, dated March 13, 2007	Pltf	s	s			4/28/10
39	Cal Am Properties Letter and Offer, dated January 30, 2006	Pltf	s	s			4/28/10
40	David Weisswasser Summary of Offer and Offer	Pltf	s	s			4/28/10
41	Purchase Offer and Sales Contract	Pltf	s	s			4/28/10

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
46	Colony Cove Mobile Estates Application for Mobilehome Space Rent Increase, submitted on or around September 28, 2007	Pltf	s	s			4/28/14
47	Colony Cove Mobile Estates Application for Mobilehome Space Rent Increase, submitted on or around September 28, 2008	Pltf	s	s			4/28/14
48	City of Carson Staff Report to Mobilehome Park Rental Review Board, dated February 13, 2008	Pltf	s	s			4/28/14

1	Exhibit	Description	Offered	Authenticity:	Admissibility:	Argument in	Date	Date
2	No.		By	Stipulated or	Stipulated or	Support of	Identified	Admitted
3				Objection?	Objection?	Admissibility		
4	49	City of	Pltf	s	s			4/28/14
5		Carson Staff						
6		Report to						
7		Mobilehome						
8		Park Rental						
9		Review						
10		Board, dated						
11		June 10,						
12		2009						
13	50	Resolution	Pltf	s	s			4/28/14
14		No. 2008-						
15		256: A						
16		Resolution						
17		Of The						
18		Carson						
19		Mobilehome						
20		Park Rental						
21		Review						
22		Board						
23		Granting A						
24		General Rent						
25		Increase For						
26		Colony Cove						
27		Mobile						
28		Estates						
	51	Resolution	Pltf	s	s			4/28/14
		No. 2009-						
		269: A						
		Resolution						
		Of The						
		Carson						
		Mobilehome						
		Park Rental						
		Review						
		Board						
		Granting A						
		General Rent						
		Increase For						
		Colony Cove						
		Mobile						
		Estates						

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
54	Staff's Additional Property Tax Worksheet for Year 1 Application [Exhibit Y to Year 1 Staff Report) - June 2008	Def's	S	S			4/28/16
55	2006-07 Operating Expense Adjustments	Pltf	s	s			4/28/16 4/29/16
57	Resolution No. 97-185: A Resolution Of The Carson Mobilehome Park Rental Review Board Granting A Rent Increase For Carson Harbor Village Mobilehome Park	Pltf	s	s if other similar pre-purchase exhibits are admitted; if not, obj relevance	Relevant to Colony Cove's expectations at the time it purchased the Park because Colony Cove's owner was aware of this Resolution when he decided to purchase the Park.		4/29/16

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*58	City of Carson Staff Report to Mobilehome Park Rental Review Board, dated October 25, 2000	Pltf	s	s if other similar pre-purchase exhibits are admitted; if not, obj relevance	Admissible and relevant as a rebuttal exhibit if any of Defendants' Exhibits 2031-2052, 2056-2058 are admitted.		
59	City of Carson Staff Report to Mobilehome Park Rental Review Board, dated February 28, 2001	Pltf	s	s if other similar pre-purchase exhibits are admitted; if not, obj relevance	Relevant to Colony Cove's expectations at the time it purchased the Park because Colony Cove's owner was aware of this report when he decided to purchase the Park.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
60	Resolution No. 2001-212: A Resolution Of The Carson Mobilehome Park Rental Review Board Granting A Rent Increase For Carson Harbor Village Mobilehome Park	Pltf	s	s if other similar pre-purchase exhibits are admitted; if not, obj relevance	Relevant to Colony Cove's expectations at the time it purchased the Park because Colony Cove's owner was aware of this Resolution when he decided to purchase the Park.		4/29/14
61	Gilchrist & Rutter Letter to Kenneth Freschauf, dated September 28, 2007	Pltf	s	s			4/28/14

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
62	Supplemental Report of Investigation of City Clerk Jim Dear, dated October 15, 2015	Pltf	s	obj: hearsay, irrelevant, prejudice far outweighs probative value, foundation, reasons set forth in Motion In Limine	Party admission, not hearsay, because the City authorized the report under FRE 801(d)(2); public record; relevant to whether the City was politically motivated when it amended the Guidelines and decided Colony Cove's rent-increase applications for Years 1 and 2, as confirmed by the Court's ruling. (See Dkt. No. 161 (Order Denying Defendants' Motion in Limine No. 4 to Exclude Evidence of Political Pressure).)	4/29/14 Net Adm	

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
65	January 19, 2006 typed cover letter from James Goldstein to Matt Crowe re: 5% capitalization rate, financing of the purchase, and Richard Close's comments about the difficulties and risks for a park owner in Carson CC000648	Def's	S	S			4/28/16
*68	City of Carson Staff Report to Mobilehome Park Rental Review Board, dated November 20, 1996	Pltf	s	s if other similar pre-purchase exhibits are admitted; if not, obj relevance	Admissible and relevant as a rebuttal exhibit if any of Defendants' Exhibits 2031-2052, 2056-2058 are admitted.		
71	Subpoena to Testify at a Deposition in a Civil Action to Kenneth Baar	Pltf	s	s			4/28/16

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
74	Analysis of the Colony Cove Mobile Estates Rent Increase Application by Kenneth K. Baar (Feb. 2008)	Defs	s	Obj: Improper expert opinion for the reasons set forth in Plaintiff's Motion in <i>Limine</i> No. 7 (See Dkt. No. 69). Fair return analysis irrelevant to any issues to be tried. (<i>Id.</i>) Relies upon an inadmissible chart comparing rent increases that Mr. Baar did not prepare. Relies on pre-purchase cases that Mr. Goldstein was not aware of.	Admissible expert opinion for reasons in Def's Opposition to Plf's MIL No. 7 ("City's Opp."). Fair return analysis is relevant as explained in City's Opp. Mr. Goldstein should have made himself aware of pre-purchase cases in order for his expectations to be reasonable.	5/3/14	5/3/14

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
75	Supplemental Analysis of Applicant's Submissions of March 27 and May 29, 2008 by Kenneth K. Baar (June 2008)	Defs	s	Obj: Improper expert opinion for the reasons set forth in Plaintiff's Motion <i>in Limine</i> No. 7. (See Dkt. No. 69.)	Admissible expert opinion for reasons in Def's Opposition to Plf's MIL No. 7.	4/3/14	5/3/14

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
76	Analysis of the Colony Cove Mobile Estates Rent Increase Application by Kenneth K. Baar (June 2009)	Defs	S	Obj: Improper expert opinion for the reasons set forth in Plaintiff's Motion <i>in Limine</i> No. 7 (<i>See</i> Dkt. No. 69). Fair return analysis irrelevant to any issues to be tried. (<i>Id.</i>) Relies upon an inadmissible chart comparing rent increases that Mr. Baar did not prepare. Relies on pre-purchase cases that Mr. Goldstein was not aware of.	Admissible expert opinion for reasons in Def's Opposition to Plf's MIL No. 7 ("City's Opp."). Fair return analysis is relevant as explained in City's Opp. Mr. Goldstein should have made himself aware of pre-purchase cases in order for his expectations to be reasonable.		5/3/16

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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
77	Attachment 1 to Baar FRCP 26(a)(2)(B) Report	Defs	s	Obj: Improper expert opinion for the reasons set forth in Plaintiff's Motion <i>in Limine</i> No. 7 (See Dkt. No. 69). Fair return analysis irrelevant to any issues to be tried. (<i>Id.</i>) Relies upon an inadmissible chart comparing rent increases that Mr. Baar did not prepare. Relies on pre-purchase cases that Mr. Goldstein was not aware of.	Admissible expert opinion for reasons in Def's Opposition to Plf's MIL No. 7 ("City's Opp."). Fair return analysis is relevant as explained in City's Opp. Mr. Goldstein should have made himself aware of pre-purchase cases in order for his expectations to be reasonable.	5/3/16	

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
78	Resolution No. 84-057: A Resolution Of The Carson Mobilehome Park Rental Review Board Granting A Resident Increase For Carson Harbor Village Mobilehome Park	Defs	S	S	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable		4/28/16

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
79	Resolution No. 2004-225: A Resolution Of The Carson Mobilehome Park Rental Review Board Granting A General Rent Increase For Paradise Trailer Park	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this decision at the time he purchased the mobilehome park.	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable	4/29/16	5/4/16

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
81	Chart Regarding City Resolutions	Defs	Obj. This is an unidentified chart allegedly summarizing City resolutions regarding rent decisions that was prepared by unnamed staff.	Obj: Exhibit to Mr. Baar's expert reports, which are inadmissible for the reasons stated in Plaintiff's Motion <i>in Limine</i> No. 7 (See Dkt. No. 69). Irrelevant because it references decisions that Mr. Goldstein was not aware of when purchasing the Park..	Dr. Baar's reports are admissible expert opinion for reasons in Def's Opposition to Plf's MIL No. 7 ("City's Opp."). Mr. Goldstein should have made himself aware of pre-purchase cases in order for his expectations to be reasonable.		
84	Uniform Standards of Professional Appraisal Practice (2010-2011 Edition)	Pltf	s	s			4/28/14 w/Drawn 5/14/14
86	Uniform Standards of Professional Appraisal Practice (2016-2017 Edition)	Pltf	s	s			4/28/14 w/Drawn 5/14/14

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
87	Assumptions and Limiting Conditions	Pltf	s	s			4/28/16 w/Drawn 5/4
88	Appraiser's Certificate by James Brabant	Pltf	s	s			4/28/16 w/Drawn 5/4
89	Excerpts from The Appraisal of Real Estate	Pltf	s	s			4/28/16 w/Drawn 5/4
92	Uniform Standards of Professional Appraisal Practice and Advisory Opinions (2006 Edition)	Pltf	s	s			4/28/16 w/Drawn 5/4
94	Expert Report of Peter A. Salomon, CPF, CFF, dated January 11, 2016	Pltf	s	s			4/28/16

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
95	Letter from Peter A. Salomon, CPA, CFF to Matthew W. Close, Esq. re: invoices for services rendered by Salomon Forensics, LLP in the Colony Cove Properties, LLC v. City of Carson matter + invoice for services rendered from January 1, 2016 through January 31, 2016	Def's	S	S			4/28/16
*96	<i>U.S. v. 429.59 Acres of Land</i> (9th Cir. 1980) 612 F.2d 459	Def's	S	S			4/28/16
1000	Marcus & Millichap Offering Memorandum	Pltf	s	s			4/28/16

1	Exhibit	Description	Offered	Authenticity:	Admissibility:	Argument in	Date	Date
2	No.		By	Stipulated or	Stipulated or	Support of	Identified	Admitted
3	1001	Resolution	Pltf	s	s			4/28/16
4		No. 98-010:						
5		A Resolution						
6		Of The City						
7		Of Carson						
8		Adopting						
9		Revised						
10		Guidelines						
11		For						
12		Implementati						
13		on Of The						
14		Mobilehome						
15		Space Rent						
16		Control						
17		Ordinance,						
18		Chapter 7,						
19		Article IV,						
20		Of The						
21		Carson						
22		Municipal						
23		Code And						
24		Replacing						
25		The Policy						
26		Guidelines						
27		For Capital						
28		Improvement						
		Rent						
		Increases <u>and</u>						
		Guidelines						
		for						
		Implementati						
		on of the						
		Mobilehome						
		Space Rent						
		Control						
		Ordinance						

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2								
3	1002	City of Carson Municipal Code, Chapter 7, Mobilehome Space Rent Control	Pltf	S	S			4/28/16
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9	1003	Resolution No. 06-149: A Resolution Of The City Council Of The City Of Carson, California, Amending Resolution No. 98-010 Adopting Revised Guidelines For Implementati on Of The Mobilehome Space Rent Control Ordinance, Chapter 7, Article IV, Of The Carson Municipal Code	Pltf	S	S			4/28/16
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
1004	<i>Palacio de Anza v. Palm Springs Rent Review Commission</i> , 209 Cal. App. 3d 116 (1989)	Pltf	s	obj: irrelevant, misleading to trier of fact	Relevant to Colony Cove's expectations at the time it purchased the Park because Colony Cove's owner was aware of this decision when he decided to purchase the Park.	4/28/16	4/28/16
1005	<i>Carson Gardens, LLC v. City of Carson Mobilehome Park Rental Review Board</i> , 135 Cal. App. 4th 856 (2006).	Pltf	s	obj: irrelevant misleading to trier of fact	Relevant to Colony Cove's expectations at the time it purchased the Park because Colony Cove's owner was aware of this decision when he decided to purchase the Park. (See Dkt. No. 149 (denying Defendants' Motion in Limine No. 2 to Exclude Carson Gardens).)		4/28/16

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
1006	Peremptory Writ of Mandate in <i>Carson Gardens, LLC v. City of Carson Mobilehome Park Rental Review Board</i> , Los Angeles Superior Court Case No. BS 072845	Pltf	s	obj: irrelevant, misleading to trier of fact	Relevant to Colony Cove's expectations at the time it purchased the Park because Colony Cove's owner was aware of the decision and its common interpretation as requiring consideration of debt service and other acquisition costs, and the writ establishes the objective reasonableness of that understanding and expectation. (See Dkt. No. 149 (denying Defendants' Motion in Limine No. 2 to Exclude <i>Carson Gardens</i>).)		

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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
1007	Admitted Facts	Pltf	N/A. Not evidence	Obj. City has no objection to providing this document to jury. But City objects to placing it on the Exhibit List because it is not evidence. Further, Plaintiff added this to the Exhibit List on April 24, 2016. The Court's meet and confer order re admissibility did not contemplate addition of new exhibits near the eve of trial	The parties have jointly agreed that the jury may accept these facts as admitted.		

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2								
3	1008	Historical Prices of S&P 500 (12/1/00 – 12/1/14)	Pltf	S	Obj. Plaintiff added this to the Exhibit List on April 24, 2016. City has not had sufficient time to prepare for Plf's use of this exhibit at trial. The Court's meet and confer order re admissibility did not contemplate addition of new exhibits near the eve of trial	The prices are properly subject to judicial notice as set forth in Colony Cove's proposed disputed jury instruction No. 14.	4/29/16	4/29/16
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
1009	Resolution No. 2003-220: A Resolution of the Carson Mobilehome Park Rental Review Board Granting a Rent Increase for Carson Harbor Village Mobilehome Park	Pltf	s	Obj. Plaintiff added this to the Exhibit List on April 24, 2016. City has not had sufficient time to prepare for Plf's use of this exhibit at trial. The Court's meet and confer order re admissibility did not contemplate addition of new exhibits near the eve of trial	Relevant to Colony Cove's expectations at the time it purchased the Park because Mr. Goldstein was aware of this resolution when he decided to purchase the Park.		

1	Exhibit	Description	Offered	Authenticity:	Admissibility:	Argument in	Date	Date
2	No.		By	Stipulated or	Stipulated or	Support of	Identified	Admitted
3	1010	City of	Pltf	s	Obj.	Relevant to		
4		Carson Staff			Plaintiff	Colony		
5		Report to			added this	Cove's		
6		Mobilehome			to the	expectations		
7		Park Rental			Exhibit List	at the time it		
8		Review			on April 24,	purchased		
9		Board for			2016. City	the Park		
10		Carson			has not had	because Mr.		
11		Harbor			sufficient	Goldstein		
12		Village			time to	was aware		
13		Mobilehome			prepare for	of this staff		
14		Park dated			Plf's use of	report when		
15		January 8,			this exhibit	he decided		
16		2003			at trial. The	to purchase		
17					Court's	the Park.		
18					meet and			
19					confer order			
20					re			
21					admissibilit			
22					y did not			
23					contemplate			
24					addition of			
25					new			
26					exhibits			
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28					of trial			

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2	2001	Complaint, <i>Carson Harbor Village, Ltd v. City of Carson</i> , U.S.DC CV-90-03428-LEW [1991 WL634911], Filed on or about Oct. 22, 1990	Defs	S	Obj: Irrelevant; FRE 403 — any minimal probative value is substantially outweighed by the danger of unfair prejudice and confusion.	Relevant to Colony Cove's expectations at the time it purchased the Park because in this complaint Colony Cove's owner alleged the Ordinance does not allow recovery of debt service sufficient for a profit, and that he lost millions of dollars due to the Ordinance.	4/28/16	4/28/16
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2002	Petition for Writ of Mandate, <i>Carson Harbor Village, Ltd. v. City of Carson Mobilehome Park Rental Review Bd., LASC BS044580</i> , Filed on or about April 22, 1997	Defs	S	Obj: Irrelevant; FRE 403 — any minimal probative value is substantially outweighed by the danger of unfair prejudice and confusion.	Relevant to Colony Cove's expectations at the time it purchased the Park because in this complaint Colony Cove's owner alleged Carson's Ordinance requires rents to remain at very low levels and does not permit reasonable increases in rents.		

1	Exhibit	Description	Offered	Authenticity:	Admissibility:	Argument in	Date	Date
2	No.		By	Stipulated or	Stipulated or	Support of	Identified	Admitted
3	2003	Complaint,	Defs	S	Obj:	Relevant to		
4		<i>Carson</i>			Irrelevant;	Colony		
5		<i>Harbor</i>			FRE 403 —	Cove's		
6		<i>Village, LTD</i>			any minimal	expectations		
7		<i>v. City of</i>			probative	at the time it		
8		<i>Carson, et</i>			value is	purchased		
9		<i>al., U.S. DC</i>			substantiall	the Park		
10		CV-01-			y	because in		
11		04799-RJK,			outweighed	this		
12		Filed on or			by the	complaint		
13		about May			danger of	Colony		
14		29, 2001			unfair	Cove's		
15					prejudice	owner		
16					and	alleged		
17					confusion.	Carson's		
18						Ordinance		
19						penalizes		
20						park owners		
21						and		
22						mandates		
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24						returns each		
25						year, and		
26						thereby		
27						destroyed		
28						his		
						expectations		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2004	City of Carson City Council Resolution No. 09-108, <i>Approving Tentative Parcel Map No. 067049 for a Mobilehome Resident Ownership Conversion of Colony Cove, An Existing Mobilehome Park</i> , dated October 20, 2009 [12 pages] CAR000206-CAR000216	Defs	S	Obj: Irrelevant. Inadmissible in light of the Court's order granting Plaintiff's Motion <i>in Limine</i> No. 4 which precludes arguments and evidence regarding Colony Cove's value and operations after July 2009. (See Dkt. Nos. 66, 146.)	Court denied Plf's MIL No. 1, which sought to exclude this evidence. Relevant to mitigation of damages because this approval gives Colony Cove the power to eliminate Carson rent control in the park. Relevant to expectations because indicates intent for profitability by means other than recovering debt service. Relevant to economic impact because an entitled park has higher value.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2005	Final Approved Subdivision Map for Conversion of Colony Cove Mobile Estates to Resident Ownership [9 pages]	Defs	S	Obj: Irrelevant. Inadmissible in light of the Court's order granting Plaintiff's Motion <i>in Limine</i> No. 4 which precludes arguments and evidence regarding Colony Cove's value and operations after July 2009. (See Dkt. Nos. 66, 146.)	Court denied Plf's MIL No. 1, which sought to exclude this evidence. Relevant to mitigation of damages because this approval gives Colony Cove the power to eliminate Carson rent control in the park. Relevant to expectations because indicates intent for profitability by means other than recovering debt service. Relevant to economic impact because an entitled park has higher value.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2006	Planning Commission Staff Report re Tentative Parcel Map No. 067049, 17700 Avalon Blvd. CAR000224-CAR000230	Defs	S	Obj: Irrelevant. Inadmissible in light of the Court's order granting Plaintiff's Motion <i>in Limine</i> No. 4 which precludes arguments and evidence regarding Colony Cove's value and operations after July 2009. (See Dkt. Nos. 66, 146.)	Court denied Plf's MIL No. 1, which sought to exclude this evidence. Relevant to mitigation of damages because this approval gives Colony Cove the power to eliminate Carson rent control in the park. Relevant to expectations because indicates intent for profitability by means other than recovering debt service Relevant to economic impact because an entitled park has higher value.		

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2								
3	2007	Self-Contained Appraisal Report by Anderson & Brabant, Inc. for Colony Cove Mobile Estates, 17700 Avalon Boulevard, Carson, California, Appraised for City of Carson dated February 28, 2011 00645 - 00727	Defs	S	S			<i>[Handwritten: 4/28/14 w/maw 5/14/14]</i>
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2008	Rebuttal Report by John G. Ellis, MAI, CRE, FRICS of Integra Realty Resources concerning Report Dated January 11, 2016, and Prepared by Peter A. Salomon, CPA, CFF For Colony Cove Properties, LLC dated February 8, 2016	Defs	S	S			4/28/16
(2009)	Expert Report of James Brabant, MAI dated February 8, 2016 concerning Rob A. Detling's Self-Contained Appraisal Report dated March 13, 2007	Defs	S	S			4/28/16 w/Drawn 5/14/16

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2010	Report by Anderson & Brabant, Inc. dated June 5, 2008 for review of the September 25, 2007 Fair Return Analysis for Colony Cove Mobile Estates prepared by John P. Neet, MAI 01498-01511	Defs	S	Obj: Irrelevant to any issue to be tried in this case for the reasons set forth in Plaintiff's Motion <i>in Limine</i> No. 8. (See Dkt. No. 71.)	Relevant to Colony Cove's expectations at the time it purchased the Park because it indicates the level of return Colony Cove should have expected. Relevant to economic impact because indicates Board's decisions placed Colony Cove on same economic footing as at time of purchase.		<i>w/Drawn 5/4/16</i>

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2011	Table of Colony Cove Profits, Years 1-8 (demonstrative)	Defs	S	Obj: Any financial information for Colony Cove after Year 2 Decision (July 2009) is irrelevant to the issues to be tried. (See Dkt Nos. 146 & 147 (granting Plaintiff's Motions in Limine Nos. 4 and 5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is a profitable investment over the long term, as Colony Cove expected.		
2012	Staff's Year 1 Colony Cove Operating & Maintenance Expenses Calculations (2004-2006/2007) [Exhibit page E-11 to Year 1 Staff Report] - June 2008	Defs	S	S			4/28/14

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
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3	2013	Staff's adjustments to claimed operating expenses for Year 2 Rent Increase Application [Exhibit pages D-15 thru D-17 of Year 2 staff report] - June 2009	Defs	S	S			4/28/10
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12	2014	Staff's Year 2 Colony Cove Operating & Maintenance Expenses Calculations (2005-2007/2008) [Exhibit page D-23 to Year 2 Staff Report] - June 2009	Defs	S	S			4/28/10
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2015	Colony Cove's Year 3 Rent Increase Application (08/09 Expense Year) - October 2009	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions <i>in Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion <i>in Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions <i>in Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2016	Staff Report for Year 3 Rent Increase Application (w/o exhibits) - February 2010	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions <i>in Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion <i>in Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions <i>in Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2017	Staff's adjustment to claimed operating expenses for Year 3 Rent Increase Application [Exhibit pages D-13 to D-15 of Year 2 staff report] - February 2010	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions in <i>Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion in <i>Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions in <i>Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2018	Staff's Year 3 Colony Cove Operating & Maintenance Expenses Calculations (07/08-08/09) [Exhibit page D-17 to Year 3 Staff Report] - February 2010	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions <i>in Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion <i>in Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions <i>in Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2019	Colony Cove's Year 4 Rent Increase Application (09/10 Expense Year) - October 2010	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions <i>in Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion <i>in Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions <i>in Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2020	Staff Report for Year 4 Rent Increase Application (w/o exhibits) - March 2011	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions <i>in Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion <i>in Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions <i>in Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2021	Staff's adjustments to claimed operating expenses for Year 4 Rent Increase Application [Exhibit pages D-21 to D-27 of Year 4 staff report] - March 2011	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions <i>in Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion <i>in Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions <i>in Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2022	Staff's Year 4 Colony Cove Operating & Maintenance Expenses Calculations (08/09-09/10) [Exhibit page D-14 to Year 4 Staff Report] - March 2011	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions in <i>Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion in <i>Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions in <i>Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3-5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2023	Colony Cove's Year 5 Rent Increase Application (2011 Expense Year) - March 2012	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions <i>in Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion <i>in Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions <i>in Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is a profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2024	Staff Report for Year 5 Rent Increase Application (w/o exhibits) - September 2012	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions in <i>Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion in <i>Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions in <i>Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is a profitable investment over the long term, as Colony Cove expected.		

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2								
3	2025	Staff adjustments to claimed operating expenses for Year 5 Rent Increase Application [Exhibit pages D-23 to D-24 of Year 5 staff report] – September 2012	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions <i>in Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion <i>in Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions <i>in Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is a profitable investment over the long term, as Colony Cove expected.		
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2026	Staff's Year 5 Colony Cove Operating & Maintenance Expenses Calculations (2009/2010-2011) [Exhibit page D-20 to Year 5 Staff Report] - September 2012	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions <i>in Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion <i>in Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions <i>in Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3-5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is a profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2027	Carson Harbor Village, Resolution 84-057: Staff Report presented at Rent Increase Hearing CAR116770-CAR116772	Defs	S	S			4/28/14
*2028	Carson Harbor Village, Resolution 84-057: Application for Rent Increase CAR116775-116787	Defs	S	S		4/28/14	4/28/14
*2029	Carson Harbor Village, Resolution 84-057: Board meeting minutes w/ Rochelle Brown testimony: relevant pages CAR116689, 116694-116694 (Relevant Excerpts)	Defs	S				4/28/14

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2								
3	*2030	Carson Harbor Village, Resolution 84-057: CHV Appraisal filed with first CHV application for rent increase CAR116793-CAR116810	Defs	S	S			4/28/14
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2031	Citation Mobilehome Park, Resolution 88-107: Staff Report presented at rent increase hearing CAR153957-CAR153979	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this report at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable		

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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2032	Citation Mobilehome Park, Resolution 88-107: Resolution 88-107 CAR179419-CAR179422	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this resolution at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable		

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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2033	Citation Mobilehome Park, Resolution 88-107: Newspaper Article CAR154043-CAR154045	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this article at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable		

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2								
3	*2034	Nu-way Senior Mobilehome Park, Resolution 92-151: Staff Report + Exhibit A to Staff Report (Application for Rent Increase) CAR169043-CAR169062	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this report at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable		
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2035	Nu-way Senior Mobilehome Park, Board Resolution 92-151 CAR179642-CAR179645	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this resolution at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable		

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
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3	*2036	Carson Gardens Trailer Lodge, Resolution 01-215: Staff Report + Exhibit A to Staff Report (Application for Rent Increase) CAR068289-CAR068330	Defs	S	Obj: Irrelevant	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable		
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1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
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3	*2037	Carson Gardens Trailer Lodge, Resolution 01-215 CAR180043-CAR180047	Defs	S	Obj: Irrelevant	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable		
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2038	Carson Gardens Trailer Lodge, Resolution 04-227 CAR180135-CAR180144	Defs	S	Obj: Irrelevant. Los Angeles County Superior Court ultimately concluded that the Board erred in not taking into account debt service in this resolution and California Court of Appeal affirmed.	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable		

1	Exhibit	Description	Offered	Authenticity:	Admissibility:	Argument in	Date	Date
2	No.		By	Stipulated or	Stipulated or	Support of	Identified	Admitted
3	*2039	Carson	Defs	Obj. This	Obj:	Relevant to		
4		Gardens		is an	Irrelevant to	whether		
5		Trailer		unidentifie	Colony	Colony		
6		Lodge,		d chart	Cove's	Cove's		
7		Resolution		allegedly	expectations	expectations		
8		04-227:		summarizi	because the	were		
9		Table of		ng City	chart	reasonable,		
10		Historical		resolutions	reference	because		
11		Applications		regarding	decisions	shows that		
12		and Debt		rent	that Mr.	prior to		
13		Service,		decisions	Goldstein	purchase of		
14		1996-2003		that was	was not	Colony		
15		[excerpt from		prepared	aware of	Cove the		
16		Exhibit J to		by	when	Board did		
17		Staff Report		unnamed	purchasing	not pass		
18		presented at		staff.	the Park.	through a		
19		Rent				new		
20		Application				owner's		
21		Hearing], pp.				purchase		
22		J25-J27				debt		
23		CAR000918-				service; a		
24		CAR000920				reasonable		
25						investor		
26						would have		
27						considered		
28						the entirety		
						of the		
						Board's past		
						practice, not		
						just that		
						which the		
						investor		
						found		
						favorable		

1	Exhibit	Description	Offered	Authenticity:	Admissibility:	Argument in	Date	Date
2	No.		By	Stipulated or	Stipulated or	Support of	Identified	Admitted
3	*2040	Carson	Defs	S	Obj:	Relevant to		
4		Gardens			Irrelevant.	whether		
5		Trailer			Los Angeles	Colony		
6		Lodge,			County	Cove's		
7		Resolution			Superior	expectations		
8		04-227:			Court	were		
9		<i>Analysis of</i>			ultimately	reasonable,		
10		<i>Carson</i>			concluded	because		
11		<i>Gardens Rent</i>			that the	shows that		
12		<i>Increase</i>			Board had	prior to		
13		<i>Application,</i>			erred in not	purchase of		
14		Dr. Kenneth			taking into	Colony		
15		K. Baar,			account	Cove the		
16		dated March			debt service	Board did		
17		2004			in this	not pass		
18		CAR000921-			resolution	through a		
19		CAR00962			and	new		
20					California	owner's		
21					Court of	purchase		
22					Appeal	debt		
23					affirmed.	service; a		
24					Improper	reasonable		
25					expert	investor		
26					testimony	would have		
27					for the	considered		
28					reasons set	the entirety		
					forth in	of the		
					Plaintiff's	Board's past		
					Motion in	practice, not		
					<i>Limine</i> No.	just that		
					7. (See Dkt.	which the		
					No. 69.)	investor		
						found		
						favorable		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2041	Carson Gardens Trailer Lodge, Resolution 2006-242 CAR180271-CAR180281	Defs	S	Obj: Irrelevant to Mr. Goldstein's expectations <i>at the time he purchased the Park</i> because the resolution was handed down on June 28, 2006, and Mr. Goldstein purchased the Park in <i>April 2006</i> .	Relevant to whether Colony Cove's expectations at the time it purchased the Park were reasonable, because indicates Board's continuing use of formulas that disregard debt service.		

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2								
3	*2042	Paradise Trailer Park, Resolution 04-225: Staff Report + Exhibit A to Staff Report (Application for Rent Increase) CAR169272-CAR169302	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this resolution at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable	4/29	
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2043	Paradise Trailer Park, Resolution 04-225: Exhibit C to Staff Report, p. C10 – C28, <i>Analysis of Fair Return Issues for Paradise Trailer Lodge Rent Increase Application</i> , Dr. Kenneth K. Baar CAR169324-CAR169342	Defs	S.	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this resolution or report at the time that he purchased the Park. Improper expert opinion for the reasons set forth in Plaintiff's Motion in <i>Limine</i> No. 7. (See Dkt. No. 69.) Fair return analysis irrelevant to any issues to be tried.	Relevant to whether Colony Cove's expectations were reasonable, because shows that prior to purchase of Colony Cove the Board did not pass through a new owner's purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which the investor found favorable	4/29/16	

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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2044	Park Villa Mobile Estates, Resolution 04-226: Staff Report CAR171394-CAR171412	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this resolution at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations at the time it purchased the Park were reasonable, because a reasonable purchaser would have considered the Board's past consideration of formulas that disregard purchase debt service	4/29/16	

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2045	Park Villa, Resolution 04-226: Exhibit D to Staff Report, <i>Analysis of Park Villa Mobilehome Park Rent Increase Application</i> , Dr. Kenneth K. Baar, dated May 2004, pp. D1-D51 CAR171452-CAR171502	Defs	S.	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this report at the time that he purchased the Park. Improper expert testimony for the reasons set forth in Plaintiff's Motion in <i>Limine</i> No. 7. (See Dkt. No. 69.)	Relevant to whether Colony Cove's expectations at the time it purchased the Park were reasonable, because a reasonable purchaser would have considered the Board's past consideration of formulas that disregard purchase debt service	4/29/16	

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2								
3	*2046	Park Villa Mobile Estates, Resolution 04-226 CAR180127-CAR180134	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this resolution at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations at the time it purchased the Park were reasonable, because a reasonable purchaser would have considered the Board's past consideration of formulas that disregard purchase debt service	4/29/14	
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2047	Park Granada Mobilehome Park, Resolution 04-230: Staff Report + Exhibit A (Application for Rent Increase) CAR170375-CAR170404	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this report or application at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations at the time it purchased the Park were reasonable, because a reasonable purchaser would have considered the Board's past consideration of formulas that disregard purchase debt service		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2048	Park Granada Mobilehome Park, Resolution 04-230: Exhibit D to Staff Report, <i>Analysis of Park Granada Rent Increase Application</i> , Dr. Kenneth K. Baar, dated September 2004, pp. D1-D30 CAR-170447-CAR170476	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this report at the time that he purchased the Park. Improper expert testimony for the reasons set forth in Plaintiff's Motion <i>in Limine</i> No. 7. (See Dkt. No. 69.)	Relevant to whether Colony Cove's expectations at the time it purchased the Park were reasonable, because a reasonable purchaser would have considered the Board's past consideration of formulas that disregard purchase debt service		

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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2049	Park Granada Mobilehome Park, Resolution 04-230 CAR180169-CAR180176	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this resolution at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations at the time it purchased the Park were reasonable, because a reasonable purchaser would have considered the Board's past consideration of formulas that disregard purchase debt service		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2050	Laco Mobilehome Park, Resolution 2007-252 CAR180384-CAR180393	Def's	S	Obj: Irrelevant to Mr. Goldstein's expectations at the time he purchased the Park because the Resolution was handed down in 2007, and Mr. Goldstein purchased the Park in April 2006	Relevant to whether Colony Cove's expectations at the time it purchased the Park were reasonable, because indicates Board's continuing use of formulas that disregard debt service.		
*2051	Carson Gardens Trailer Lodge, Resolution 2008-254 CAR180407-CAR180416	Def's	S	Obj: Irrelevant to assessing reasonableness of expectations because the Resolution was handed down in 2008, and Mr. Goldstein purchased the park in April 2006.	Relevant to whether Colony Cove's expectations based on Exhibits 1005 and 1006 were reasonable, because Court of Appeal approved this resolution which does not pass through owner's purchase debt service		

1	Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
2								
3	*2052	Dominguez Trailer Park, Resolution 2008-259 CAR180462-CAR180468	Defs	S	Obj: Irrelevant to assessing reasonableness of expectations because the Resolution was handed down in 2008, and Mr. Goldstein purchased the park in April 2006.	Relevant to whether Colony Cove's expectations at the time it purchased the Park were reasonable, because indicates Board's continuing use of formulas that disregard debt service.		
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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2053	Colony Cove Mobile Estates, Resolution 2010-277 CAR180663-CAR180689	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions in <i>Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion in <i>Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions in <i>Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3-5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2054	Colony Cove Mobile Estates, Resolution 2011-289 CAR180797-CAR180815	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions in <i>Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion in <i>Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions in <i>Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3-5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2055	Colony Cove Mobile Estates, Resolution 2012-306 CAR180901-CAR180919	Defs	S	Obj: Irrelevant and inadmissible pursuant to the Court's orders granting Plaintiff's Motions in <i>Limine</i> Nos. 4 and 5. (See Dkt Nos. 146 (granting Plaintiff's Motion in <i>Limine</i> No. 4 to exclude evidence regarding park value after July 2009) & 147 (granting Plaintiff's Motions in <i>Limine</i> No. 5 to exclude evidence of Plaintiff's rent increase applications in Years 3–5.))	Relevant to Colony Cove's expectations at the time it purchased the Park, and to economic impact, because it indicates the Park is an increasingly profitable investment over the long term, as Colony Cove expected.		

Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2056	Park Avalon Mobile Estates, Resolution 81-025 CAR170208-CAR170209	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this resolution at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations at the time it purchased the Park were reasonable, because a reasonable purchaser would have considered the entirety of the Board's past practices regarding treatment of purchase debt service expenses, not just that which investor found favorable		

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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2057	Imperial Carson Mobile Estates, Resolution 92-153 CAR179656-CAR179663	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this resolution at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations were reasonable, because shows the Board did not always pass through 100% of purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which investor found favorable		

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Exhibit No.	Description	Offered By	Authenticity: Stipulated or Objection?	Admissibility: Stipulated or Objection?	Argument in Support of Admissibility	Date Identified	Date Admitted
*2058	Imperial Carson Mobile Estates, Resolution 92-153: Staff Report presented at rent increase hearing CAR122344-CAR122356	Defs	S	Obj: Irrelevant to Colony Cove's expectations because Mr. Goldstein was not aware of this resolution at the time that he purchased the Park.	Relevant to whether Colony Cove's expectations were reasonable, because shows the Board did not always pass through 100% of purchase debt service; a reasonable investor would have considered the entirety of the Board's past practice, not just that which investor found favorable		

* Asterisk indicates exhibits which a party may offer if the need arises.

1 DATED: April 26, 2016

Respectfully submitted,

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1 DATED: April 26, 2016

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19 **ATTESTATION**

20 I hereby attest that the other signatory listed, on whose behalf this filing is
21 submitted, concurs in the filing's content and has authorized the filing.

22 Dated: April 26, 2016

O'MELVENY & MYERS LLP

23 By: /s/ Matthew W. Close
24 Matthew W. Close